


October 20, 2001

MEMORANDUM

TO: Katherine B. Kelly
Administrator
Air Quality Division

FROM: Rick McCormick, Air Quality Engineer
Technical Services Division

THROUGH: Mike Simon, Facility Operations Coordinator
Air Quality Division 

SUBJECT: T2-010102, Louisiana-Pacific, Sandpoint
Technical Analysis for the Tier II Operating Permit No. 017-00003 Renewal

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 58.01.01 Section 404.04 *Rules for the Control of Air Pollution in Idaho (Rules)* for Tier II Operating Permits.

PROJECT DESCRIPTION

This project involves the modification and renewal of the Tier II Operating Permit (OP) issued to Louisiana-Pacific's (LP) Sandpoint, Idaho, planer mill July 7, 1995. The Tier II OP has been modified to reflect all applicable state and federal rules and regulations. The Tier II OP will supersede the original Tier II OP. The modification request consisted of the following:

- Administrative changes;
- Increasing the Hog Fuel Boiler pound per hour emission limits for carbon monoxide (CO), oxides of nitrogen (NO_x), and sulfur dioxides (SO₂); and
- Source-testing frequency changes.

SUMMARY OF EVENTS

- July 7, 1995, the LP-Sandpoint facility was issued a Tier II OP to implement RACT/RACM in accordance with the Sandpoint State Implementation Plan (SIP) control strategy.
- July 14, 1995, the Department of Environmental Quality (DEQ) received an application for a modification to the Tier II OP from LP-Sandpoint requesting an increase in allowable operating hours and emission limits for two natural gas boilers.
- September 18, 1995, the Tier II OP was modified to include the emissions of two natural gas boilers operating 8,760 hours per year.
- March 29, 2001, DEQ received an application for a modification to the Tier II OP from LP-Sandpoint requesting several administrative changes and an increase in the hog fuel boiler pound per hour emission limits for CO, NO_x, and SO₂.
- May 3, 2001, the application was declared complete.
- July 20, 2001, the proposed Tier II OP was sent out for public comment.
- August 20, 2001, public comments on the proposed Tier II OP were received by DEQ.

FACILITY DESCRIPTION

The LP-Sandpoint facility is a planing mill that produces kiln-dried dimensional lumber. Haul trucks deliver rough-cut green lumber to the Sandpoint facility by offsite sources. The green lumber is unloaded and stored temporarily before being placed into drying kilns to reduce the moisture content. Dried lumber is then planed for a smooth surface finish and cut to the desired dimensions by the trim saw. The finished lumber is restacked and banded for shipping. Occasionally, the ends of the lumber are spray-painted with a water-based, low VOC product prior to shipment. This process is called end sealing. Other loads of lumber are paper-wrapped, rather than end sealed. The lumber is transported to haul trucks or rail cars for shipment off-site. By-products from processing the green lumber include planer shavings, sawdust, and hogged trim ends from the trim saw. These materials are by-products of kiln-dried lumber and are routed through various cyclones to the truck bin, where the material is batch dropped into haul trucks for off-site transport. Haul trucks carrying wood debris derived from off-site sources deliver hogged fuel with approximately 50 % moisture content to a truck dump. The fuel is transferred from the truck dump by a conveyor to a three-sided fuel house. It is then conveyed from the fuel house to the boiler for combustion. Front-end loaders clear these areas of wood debris when necessary. Emissions from the hogged fuel handling are considered negligible due to large particle size and high moisture content.

Sources that emit particulate matter with an aerodynamic equal to or less than 10 microns (PM_{10}) at this facility can be divided into three main categories: combustion sources, cyclones and truck bin baghouse, and fugitive emissions sources.

Combustion Sources

Combustion sources include a Kipper and Sons Hog Fuel boiler and two natural gas-fired boilers.

1. Hog Fuel Boiler Source Description

1.1 Process Description

The primary purpose of the hog fuel boiler is to produce steam heat to dry green lumber in the drying kilns. Green lumber is derived from off-site sources. Hog-fuel for the wood debris boiler consists of shavings and bark and is primarily from off-site sources.

Wood debris generated from other wood products industries are delivered by haul truck and unloaded into a truck dump. The primary method of transferring this material from the truck dump to the fuel storage house is by a conveyor belt. Occasionally, a front-end loader is used to haul the wood debris from the truck dump to the fuel storage house. The fuel storage house is a three-sided roofed structure. Within the fuel storage house, a hydraulic reclaimer feeds hogged fuel by covered conveyor belt to the boiler-metering bin. The Kipper and Sons Hog Fuel boiler has a design capacity of 75,000 lbs. of steam per hour and/or operates at 125 MMBtu/hr gross heat input, as agreed to in the 1991 settlement agreement between DEQ and LP-Sandpoint. This boiler operates nearly continuously in order to supply the kilns with process steam to drive off the excess moisture in the green lumber.

1.2 Control Description

A multiclone followed by an electrified filter bed (EFB) control PM_{10} emissions sources from the boiler. Emissions from the boiler are vented through the EFB stack. Emissions from the EFB pneumatic gravel cleaning system are controlled by a media baghouse vented through the media baghouse vent.

The 1995 Tier II OP conditional control measure operating requirement redirecting the EFB baghouse vent from a horizontal to a vertical position was completed by LP-Sandpoint on July 11, 1995.

Annual source testing is currently included as a permit requirement for this emissions unit. Future source testing will be required as described in Monitoring and Recordkeeping Requirements for the Hog Fuel Boiler, Section 3.3 of this permit, on the boiler stack but not on the EFB Media Baghouse Vent.

1.3 Equipment Specifications

Kipper and Sons Hog Fuel Boiler:

- Design heat input capacity is 125 MMBtu/hr. Design capacity is 75,000 lbs. steam/hr.
- Year manufactured: 1977, serial number: 1018
- Stack parameters: boiler is vented to the EFB stack.

Electrified Filter Bed:

- EFB Configuration: electrified filter bed using gravel filter as collection electrodes within two 36,000 actual cubic feet per minute (acfm) louvered conical hoppers.
- Performance design characteristics: rated capacity: 72,000 acfm.
- Serial number: EFB FDC 75.
- Stack parameters: stack height is minimum of 18.3 meters; stack area is 1.4 square meters.

EFB Cleaning System Baghouse:

- Baghouse configuration: aeropulse, 72 bags, each 4 inches in diameter and 10 feet long.
- Performance design characteristics: operating pressure drop of approximately 5 inches water gauge.
- Stack parameters: stack height is a minimum of 7.6 meters; stack area is 0.25 square meters.

2. Natural Gas Boilers Source Description

2.1 Process Description

In the event the wood waste boiler is shut down, the two natural gas boilers supply steam to the dry kilns.

Manufacturer:

- Cleaver Brooks 400 Hp (xz); model number: CB7 60-400 (xz);
- Rated capacity: 14,000 lbs. steam/hr (each).

2.2 Controls

Emissions from the two natural gas-fired boilers are uncontrolled and each vent through separate stacks.

Cyclones and Truck Bin Baghouse

The cyclones and related pneumatic equipment are used as means of process control. Wood by-product gathered from operation of the facility is of very low moisture content and historically has been sold to external and internal customers. Wood by-products are collected and transferred pneumatically to the shavings loadout truck bin where they are transferred to haul trucks for transfer off site.

3. Pneumatic Conveyance System - Source Description

3.1 Process Description

The cyclones and related pneumatic equipment are used as a means of process control. The by-products gathered from operation of this facility have low moisture content. These by-products are collected and transferred pneumatically to the truck bin (by-product loadout bin) where it is transferred to haul trucks.

Dried lumber is removed from the kilns and planed to desired dimensions. Planer shavings are collected from the planing operation and are transported pneumatically to the planer cyclone where the shavings drop out into the truck bin.

From the planer, the lumber is conveyed to the end-trimmer area where the lumber is sawed to desired length. Sawdust and trim ends are by-products. Trim ends that are too small to be used at other off-site facilities are hogged and, like the sawdust, are pneumatically conveyed to the transfer cyclone. The transfer cyclone conveys this material to the planer cyclone where it joins the planer shavings stream for

eventual deposition into the truck bin. The end trim and transfer cyclones are point sources of PM₁₀ emissions. The planer cyclone's exhaust vent emissions are routed directly to the truck bin baghouse, which is a source of PM₁₀ emissions.

The wood by-product captured by the truck bin baghouse is shaken out and transferred to the truck bin via the closed-loop (does not exhaust to the atmosphere) truck bin cyclone. The cut shop hog unit equipment was removed in 1993.

3.2 Control Description

The transfer cyclone and truck bin baghouse control PM₁₀. Point source emissions occur at the exhaust vent for each of the above control devices. The truck bin vent is a source of uncontrolled fugitive PM₁₀ emissions.

LP-Sandpoint completed the 1995 Tier II OP conditional control measure operating requirement redirecting the truck bin baghouse vent from a horizontal to a vertical position on February 21, 1996.

LP-Sandpoint completed the 1995 Tier II OP conditional control measure operating requirement to remove the end trim cyclone on May 15, 1996. The cyclone was completely disconnected and removed from operations.

3.3 Equipment Specifications

Transfer Cyclone:

- Manufacturer: information not available.
- Performance design characteristics: not available.
- Stack parameters: vent height is a minimum of 13.7 meters with a minimum vent diameter of 30 inches.

Truck Bin Baghouse:

- Manufacturer: U.S. Metal Works, Inc.
- Performance design characteristics: not available.
- Manufacturer design specifications: 234 bags with a six inch diameter.

Fugitive Emissions Sources

Fugitive PM₁₀ emissions sources at this facility are created by wood by-product loadout from the truck bin, truck bin venting, end coating (sealing paint) finished product bundles, handling ash from the hog fuel boiler, material transfer, and vehicle traffic on paved roads. Fugitive emissions at this facility are classified by process and paved road emissions.

4. Process Fugitive Emissions Sources - Source Description

4.1 Process Description

Process fugitive emissions sources include the truck bin loadout, dry kilns, end sealing operation, and ash handling.

4.1.1 Truck Bin Loadout

Planer shavings, sawdust, and hogged trim ends from the end trim saws are conveyed pneumatically to the truck bin. Haul trucks are loaded with the wood by-product. The wood by-product possesses low moisture content due to kiln drying and sawing operations (in the case of sawdust) and is a source of fugitive PM and PM₁₀ emissions resulting from the material transfer.

4.1.2 Dry Kilns

Green lumber is placed in the kilns and is dried using process steam from either the wood waste boiler or the natural gas boilers. Fugitive volatile organic compound (VOC) and condensable PM₁₀ emissions are created during the drying process.

4.1.3 End Sealing Operation

Once the finished lumber has been stacked and banded into shipping bundles, the ends of the lumber are seal coated with spray paint. The spray painting operation occurs in a partially enclosed structure. The paint has a low VOC content and is water-based.

4.1.4 Ash Handling

Fugitive PM and PM₁₀ emissions are created during the material transfer of the wood waste boiler ash for transport to the three-side ash storage shed.

4.2 Control Description

4.2.1 Truck Bin Loadout

The 1995 Tier II OP conditional control measure to complete the fourth side enclosure of the truck bin loadout was completed by LP-Sandpoint on May 15, 1996.

4.2.2 Dry Kilns

Volatile Organic Compounds (VOC) and condensable PM₁₀ emissions are vented uncontrolled. Emissions from three of the kiln rooms are through 10 vents and emissions from the remaining two kilns are through eight vents.

4.2.3 End Sealing Operation

The 1995 Tier II OP conditional control measure to replace the existing curtain in the outside wall at the end sealing application area with a wind resistant material was completed on February 22, 1996. Negative pressure is also provided whenever the end sealing operation is in use.

4.2.4 Ash Handling

Water shall be applied to the wood waste boiler ash prior to transfer to the three-sided ash storage structure.

5. **Paved Road Emissions - Source Description**

5.1 Process Description

Vehicle fugitive emission sources result from facility paved roads. Unpaved areas of the facility are used for bone yard, snow storage, and infiltration.

Lumber and wood debris trucks, front-end loaders, and other vehicles operate on the plant site. Lumber trucks haul rough-cut green lumber to the lumber storage area on paved roads. Vehicle traffic at the plant site occurs primarily on paved roads. Wood by-product used to fuel the hog fuel boiler is delivered to the fuel storage shed by wood debris trucks on paved roads.

5.2 Control Description

Mechanical sweeping and/or flushing with water controls emissions from vehicle traffic on paved roads.

The conditional control measure, which required paving to all remaining unpaved haul roads, has been completed as stated by LP-Sandpoint in their March 29, 2001, Tier II OP modification request.

As requested by LP-Sandpoint in its March 29, 2000, Tier II OP modification request, the operating, monitoring, and recordkeeping requirements associated with the unpaved haul roads has been removed. The operating requirements have been revised to include reasonable control of fugitive emissions as required per IDAPA 58.01.01.651.

DISCUSSION

1. Emissions Estimates

The 1995 Tier II OP emissions estimates and assumptions for the revised SIP inventory form the basis for LP-Sandpoint's operating conditions, and thus the emission estimates used for modeling in the attainment demonstration.

On January 23, 2001, DEQ determined that the proposed upgrades to the LP-Sandpoint dry kilns are not modifications, as defined by IDAPA 58.01.01.006.58, because the operational capacity of the dry kilns will not increase beyond those limited in the Tier II OP (200 million board feet per year of finished product).

A throughput limitation of 200 million board feet per year of finished product is the basis for the permitted material throughputs and emissions limits for facility operation after incorporation of contingency measures. LP-Sandpoint will be allowed to operate 24 hours per day, seven days per week, 52 weeks per year (previous facility operation restrictions of 120 hours per week no longer apply).

LP-Sandpoint has requested a short-term pound per hour (lb/hr) emissions increase for NO_x to 15.83 lb/hr, and SO_2 to 2.5 lb/hr. A revision of the maximum lb/hr emissions increase for CO from 120 lb/hr to an average CO emissions limit of 90 lb/hr and 394.2 T/yr has been made by DEQ. The CO average emissions limit is based on a three-hour average source test. The lb/hr emissions increase is based on the maximum steam rate of 75,000 lb steam/hr. LP-Sandpoint has supplied hourly and annual emission factors for the hog fuel boiler. LP-Sandpoint's example calculations are based on an average annual steaming rate for the hog fuel boiler of 51,315 lb/hr operating 8,640 hr/yr. Emissions calculations have been provided by DEQ supporting the requested emission increases in Appendix A.

LP-Sandpoint requested no change in PM_{10} and VOC emissions.

2. Source Testing Requirements

LP-Sandpoint has requested a change in the source testing frequency for the Kipper and Sons wood waste boiler. The wood waste boiler has successfully complied with the grain-loading standard and PM_{10} pounds per hour emissions limit at various steaming rates for each run pertaining to the three most recent source tests. The CO hourly emissions limit has been increased from 60 lb/hr to an average of 90 lb/hr and meets the CO National Ambient Air Quality Standard (NAAQS). The source-testing frequency for PM_{10} and CO will be evaluated as a tiered approach, as stated in the wood waste boiler Section 3.3.

Additional source testing parameters may be requested by the Coeur d'Alene Regional Office to comply with the CO emissions limit.

3. Modeling

The 1995 Tier II OP demonstrated PM_{10} attainment of the 24-hour average (150 micrograms per cubic meter (ug/m^3)) PM_{10} NAAQS by implementing a control strategy in the updated version of the *Sandpoint Area Particulate (PM_{10}) Air Quality Improvement Plan*.

Modeling was performed using SCREEN3 in support of the lb/hr emissions increase of CO, NO_x , and SO_2 , taking into account building downwash for the highest structure. The modeling demonstration is provided in Appendix B.

- CO: The modeled one-hour and eight-hour ($0.8 \times 248.9 \text{ ug}/\text{m}^3 = 199 \text{ ug}/\text{m}^3$) average concentrations for CO are $248.9 \text{ ug}/\text{m}^3$ and $199 \text{ ug}/\text{m}^3$, respectively.
- NO_x : Annual NO_x emissions are not increasing; therefore, there will be not be a change in the NAAQS annual impact for NO_x .
- SO_2 : The modeled three-hour ($0.9 \times 6.9 \text{ ug}/\text{m}^3 = 6.2 \text{ ug}/\text{m}^3$), 24-hour ($0.4 \times 6.9 \text{ ug}/\text{m}^3 = 2.8 \text{ ug}/\text{m}^3$), and annual ($0.08 \times 6.9 \text{ ug}/\text{m}^3 = 0.5 \text{ ug}/\text{m}^3$) average concentrations for SO_2 are $6.2 \text{ ug}/\text{m}^3$, $5.5 \text{ ug}/\text{m}^3$ and $0.5 \text{ ug}/\text{m}^3$, respectively.

Modeled pollutant concentrations are added to the corresponding state of Idaho background concentrations compared against the NAAQS as demonstrated below:

| <u>Pollutant + Averaging Period</u> | <u>Pollutant Concentration (ug/m³) + State Background Concentration (ug/m³)</u> | <u>NAAQS (ug/m³)</u> |
|---|---|---------------------------------|
| CO (1-hr) | 248.9+11,450 = 11,699 | 40,000 |
| CO (8-hr) | 199+5,130 = 5,329 | 10,000 |
| SO ₂ (3-hr) | 6.2+374 = 380.2 | 1,300 |
| SO ₂ (24-hr) | 2.8+120 = 122.8 | 365 |
| SO ₂ (annual) | 0.5+18.3 = 18.8 | 80 |

The modeled pollutant concentrations demonstrate compliance with the NAAQS.

4. Area Classification

Louisiana Pacific in Sandpoint, Bonner County, Idaho, is located in Air Quality Control Region 63. The area is classified as nonattainment for PM₁₀ and attainment or unclassifiable for all other federal and state criteria air pollutants (i.e., CO, NO_x, VOCs, and SO_x).

5. Facility Classification

LP-Sandpoint is not a designated facility as defined in IDAPA 58.01.01.006.27. LP-Sandpoint is a major facility for CO emissions as defined in IDAPA 58.01.01.006.55. The facility is classified as an 'A' source because the actual emissions of CO are greater than 100 tons per year.

LP-Sandpoint requested to change their Standard Industrial Classification (SIC) code in their March 29, 2001, Tier II OP modification request from SIC 3273 to 2421 for the general classification of sawmills and planing mills.

6. Regulatory Review

This OP is subject to the following permitting requirements:

- IDAPA 58.01.01.401 Tier II Operating Permit
- IDAPA 58.01.01.403 Permit Requirements for Tier II Sources
- IDAPA 58.01.01.404.01(c) Opportunity for Public Comment
- IDAPA 58.01.01.404.04 Authority to Revise or Renew Operating Permits
- IDAPA 58.01.01.406 Obligation to Comply
- IDAPA 58.01.01.470 Permit Application Fees for Tier II Permits
- IDAPA 58.01.01.625 Visible Emissions Limitation
- IDAPA 58.01.01.650 General Rules for the Control of Fugitive Dust
- IDAPA 58.01.01.675 Particulate Matter Standards for New Fuel Burning Equipment Sources

7. AIRS

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

| Air Program Description | SIP | PSD | NESHAP | NSPS | MACT | TITLE V | AREA CLASSIFICATION |
|-------------------------|-----|--------------|--------|------|------|--------------|---|
| | | | | | | | A - Attainment U - Unclassifiable N - Nonattainment |
| SO ₂ | B | B | | | | B | A/U |
| NO _x | B | B | | | | B | A/U |
| CO | A | B | | | | A | A/U |
| PM ₁₀ | B | B | | | | B | N |
| PT (Particulate) | B | B | | | | B | A/U |
| VOC | B | B | | | | B | A/U |
| THAP (Total HAPs) | | | | | | | |
| Other (specify below:) | | | | | | | |
| VE/FE/FD * | ND | ND | ND | ND | ND | ND | |

* VE/FE/FD (visible emissions, fugitive emissions, and fugitive dust) are entered for compliance purposes only and do not require evaluation by the permit engineer.

AIRS/AFS CLASSIFICATION CODES:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

8. Permit Review

This permit review summarizes changes from the July 7, 1995 Tier II OP to the renewed Tier II permit. The following changes are categorized by each source:

Hog Fuel Boiler

All references in the Tier II permit to Woodwaste Boiler have been changed to Hog Fuel Boiler.

Operating Requirements

Steam production limit of 68,500 pounds of steam per hour changed to 65,000 pounds of steam per hour based on a three-hour average established by past performance testing.

Maintenance of the EFB and EFB media baghouse was subject to a maintenance action based on visible emissions thresholds. Changed to scheduled and routine maintenance and notification of excess emissions.

Conditional control measure implemented. EFB baghouse vent redirected to a vertical position.

Monitoring and Recordkeeping Requirements

The maximum hourly steam production rate per day was changed to reflect a three-hour steam average consistent with source testing requirements. The total steam production and the total hours of operation per year will be monitored by an annual rolling average.

Source testing includes changes specific to CO and PM₁₀ monitoring.

Reporting Requirements

Semi-annual reports for hourly, daily, and annual data on operating rates were changed to rolling averages for consecutive 3-hour data operating rates, total hours of operation per year, and steam production in tons per year.

A maintenance report subject to opacity corrective actions was changed to "routine and schedule maintenance reports shall be prepared stating any excess emissions and corrective actions taken."

Natural Gas Boilers

Reporting Requirements

Semi-annual reports for hourly and annual data operating rates were changed to rolling averages for total hours of operation per year and steam production in tons per year.

Pneumatic Conveyance

Operating Requirements

Baghouse specifications were changed to incorporate the baghouse pressure drop and air-to-cloth ratio.

Conditional control measures implemented. Redirected truck bin baghouse vent from horizontal to vertical position and removed end trim cyclone.

Maintenance provision added to reflect excess emissions operating requirement for the truck bin baghouse.

Monitoring and Recordkeeping Requirements

Previous conditional control measures implemented and weekly monitoring requirement removed. Production hours previously limited to 120 hours per week have been changed to allow the facility to operate 24 hours per day, seven days a week.

Maintenance provision added to reflect excess emissions reporting for the truck bin baghouse.

Process Fugitive Emission Sources

Operating Requirements

Truck Bin Loadout Maximum Throughput:

Conditional control measure implemented for enclosing the truck bin loadout operation.

Dry Kiln Maximum Throughput:

The quantity of green lumber tracked and recorded as finished board feet is a redundant requirement. The quantity of finished lumber produced shall not exceed 200 million board feet per year is a requirement in section 2.1.

End Sealing Operation:

Conditional control measure implemented. Wind resistant curtain on the outside wall of the end sealing application area.

Paved Road Emissions

Name change from Vehicle Fugitive Emissions Sources to Paved Road Emissions.

The operating, monitoring, and recordkeeping requirements associated with the unpaved haul roads have been removed.

Operating Requirements

Conditional control measure implemented, which required paving of all remaining unpaved haul roads. Speed limit and environmentally safe chemical dust suppressant removed from unpaved roads. Replaced with reasonably controlling fugitive emissions per IDAPA 58.01.01.650 and 651.

Monitoring and Recordkeeping Requirements

Chemical Dust Suppressant Application Plan and Log removed.
Replaced with Fugitive Dust Control Procedures:

1. Sweeper/water truck operator shall maintain a log and record the date and times of operation.
2. Facility to develop and maintain Standard Operating Procedures (SOPs) and utilized Best Management Practices for control of fugitive emissions.

Reporting Requirements

Chemical Dust Suppressant Application Plan and Log removed.
Replaced with sweeper/water truck operator's log records to be maintained onsite for most recent two-year period and a copy of the Fugitive Dust Control SOPs made available to DEQ upon request.

FEES

Fees apply to this facility in accordance with IDAPA 58.01.01.470. The facility is subject to permit application fees for this modified Tier II OP of \$500.00. On May 16, 2001, the Coeur d'Alene Regional Office received payment of \$500 from LP-Sandpoint for the Tier II Operating Permit modifications.

RECOMMENDATIONS

Based on the review of the application materials and all applicable state and federal regulations, staff recommends that DEQ issue the proposed Tier II OP to LP-Sandpoint. An opportunity for public comment on the air quality aspects of the proposed OP shall be provided in accordance with IDAPA 58.01.01.404.01.c. On May 3, 2001, DEQ notified the facility in writing of the required Tier II application fee of \$500.00. The permit will be issued upon receipt of the fee.

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cc: Tom Harman, Coeur D'Alene RO
Belinda McFarland, Technical Services

APPENDIX A

Emission Estimate Calculations

Louisiana Pacific-Sandpoint

Hog Fuel Boiler (HFB) Emissions Estimates

Assumptions - Provided by LP-Sandpoint

- HFB operates 8,640 hr/yr and currently supplies a minimum of 98% of site steam requirements.
- HFB maximum hourly steaming rate is 75,000 lb/hr.
- Specific steam consumption = 2,071.8 lb steam/thousand board feet (MBF), based on 2000 annual kiln production and steam generation data.
- HFB average annual steaming rate is 51,315 lb/hr [(214,000 MBF/yr Input x 2,071.8 lb steam/MBF)/ 8,640].
- 214,000 MBF is the maximum kiln throughput.

HFB Emission Factors - Hourly and Annual Emission Factors (EF) provided by LP-Sandpoint

| <u>Pollutant</u> | <u>EF</u> | <u>Units</u> | <u>Reference</u> |
|------------------------|-----------|--------------|---|
| CO annual | 0.773 | lb/Mlb steam | Average from August and September 2000 source tests |
| CO hourly | 1.03 | lb/Mlb steam | Average run from August and September 2000 source tests |
| NO _x annual | 0.195 | lb/Mlb steam | Average from August and September 2000 source tests |
| NO _x hourly | 0.211 | lb/Mlb steam | Maximum run from August and September 2000 source tests |
| SO ₂ | 0.014 | lb/Mlb steam | Oregon DEQ HF Boiler SO ₂ Emission Factor |

Emission Calculations

CO: 75 Mlb steam/hr x 1.03 lb/Mlb steam = 77.25 lb/hr CO

51.315 Mlb steam/hr x 0.773 lb/Mlb steam x 8,640 hr/yr x 1 ton/2,000 lb = 171.4 tpy CO
(90 lb/hr x 8,760 hr/yr)/2,000 lb/ton = 394.2 tpy

NO_x: 75 Mlb steam/hr x 0.211 lb/Mlb steam = 15.83 lb/hr NO_x

51.315 Mlb steam/hr x 0.195 lb/Mlb steam x 8,640 hr/yr x 1 ton/2,000 lb = 43.2 tpy NO_x

SO₂: 75 Mlb steam/hr x 0.014 lb/Mlb steam = 1.05 lb/hr SO₂
LP-Sandpoint requests 2.50 lb/hr SO₂

51.315 Mlb steam/hr x 0.014 lb/Mlb steam x 8,640 hr/yr x 1 ton/2,000 lb = 3.1 tpy SO₂
3.1 tpy SO₂ exceeds 1995 Tier II OP of 3.03 tpy SO₂

2.5 lb/hr SO₂ x 8,640 hr/yr x 1 ton/2,000 lb = 10.8 tpy SO₂

SO₂ modeled annual concentration based on 2.5 lb/hr SO₂. Therefore, LP-Sandpoint requested emission limit of 6.2 tpy SO₂ based on a telephone conversation with DEQ.

APPENDIX B

Modeling Results

Louisiana Pacific-Sandpoint

04/13/01
11:01:37

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Louisiana Pacific Sandpoint SO2

SIMPLE TERRAIN INPUTS:

| | | |
|-------------------------|---|----------|
| SOURCE TYPE | = | POINT |
| EMISSION RATE (G/S) | = | 0.315000 |
| STACK HEIGHT (M) | = | 26.2128 |
| STK INSIDE DIAM (M) | = | 1.4204 |
| STK EXIT VELOCITY (M/S) | = | 21.2598 |
| STK GAS EXIT TEMP (K) | = | 430.3722 |
| AMBIENT AIR TEMP (K) | = | 293.1500 |
| RECEPTOR HEIGHT (M) | = | 0.0000 |
| URBAN/RURAL OPTION | = | RURAL |
| BUILDING HEIGHT (M) | = | 19.2024 |
| MIN HORIZ BLDG DIM (M) | = | 13.7160 |
| MAX HORIZ BLDG DIM (M) | = | 39.6240 |

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 33.527 M**4/S**3; MOM. FLUX = 155.284 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

| DIST (M) | CONC (UG/M**3) | STAB | U10M (M/S) | USTK (M/S) | MIX HT (M) | PLUME HT (M) | SIGMA Y (M) | SIGMA Z (M) | DWASH |
|-------------|-------------------|------|---------------|---------------|---------------|-----------------|----------------|----------------|-------|
| 53. | 0.2504E-09 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 15.23 | 14.99 | NO |
| 100. | 4.912 | 4 | 15.0 | 17.3 | 4800.0 | 26.38 | 8.20 | 11.80 | SS |
| 200. | 6.789 | 4 | 10.0 | 11.6 | 3200.0 | 28.60 | 15.56 | 15.73 | SS |
| 300. | 5.198 | 4 | 10.0 | 11.6 | 3200.0 | 31.03 | 22.61 | 18.74 | SS |
| 400. | 4.013 | 4 | 10.0 | 11.6 | 3200.0 | 33.82 | 29.45 | 21.64 | SS |
| 500. | 3.526 | 4 | 10.0 | 11.6 | 3200.0 | 34.99 | 36.15 | 24.45 | SS |
| 600. | 3.264 | 4 | 10.0 | 11.6 | 3200.0 | 34.99 | 42.72 | 27.19 | SS |
| 700. | 2.973 | 4 | 10.0 | 11.6 | 3200.0 | 34.99 | 49.19 | 29.86 | SS |
| 800. | 2.669 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 55.57 | 31.73 | SS |
| 900. | 2.419 | 4 | 10.0 | 11.6 | 3200.0 | 34.99 | 61.88 | 32.72 | SS |
| 1000. | 2.268 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 68.13 | 34.16 | SS |
| 1100. | 2.122 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 74.31 | 36.13 | SS |
| 1200. | 1.983 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 80.44 | 38.04 | SS |
| 1300. | 1.853 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 86.52 | 39.90 | SS |
| 1400. | 1.733 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 92.55 | 41.71 | SS |
| 1500. | 1.623 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 98.54 | 43.47 | SS |
| 1600. | 1.522 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 104.49 | 45.20 | SS |
| 1700. | 1.429 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 110.41 | 46.89 | SS |
| 1800. | 1.345 | 4 | 8.0 | 9.2 | 2560.0 | 41.00 | 116.28 | 48.55 | SS |

| | | | | | | | | | |
|--------|-------|---|-----|-----|---------|--------|---------|-------|----|
| 1900. | 46.62 | 4 | 5.0 | 5.8 | 1600.0 | 62.20 | 122.13 | 48.94 | SS |
| 2000. | 45.32 | 4 | 5.0 | 5.8 | 1600.0 | 62.20 | 127.94 | 50.57 | SS |
| 2100. | 44.00 | 4 | 5.0 | 5.8 | 1600.0 | 62.20 | 133.73 | 52.16 | SS |
| 2200. | 44.01 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 69.42 | 25.97 | SS |
| 2300. | 44.54 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 72.28 | 26.47 | SS |
| 2400. | 44.96 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 75.12 | 26.97 | SS |
| 2500. | 42.07 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 77.95 | 26.66 | SS |
| 2600. | 42.43 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 80.76 | 27.13 | SS |
| 2700. | 42.54 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 83.57 | 27.54 | SS |
| 2800. | 42.59 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 86.36 | 27.94 | SS |
| 2900. | 42.59 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 89.15 | 28.34 | SS |
| 3000. | 42.54 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 91.92 | 28.73 | SS |
| 3500. | 41.78 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 105.65 | 30.61 | SS |
| 4000. | 40.47 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 119.17 | 32.36 | SS |
| 4500. | 38.88 | 6 | 4.0 | 6.8 | 10000.0 | 50.64 | 132.50 | 34.00 | SS |
| 5000. | 37.67 | 6 | 3.5 | 5.9 | 10000.0 | 53.37 | 145.67 | 35.32 | SS |
| 5500. | 36.44 | 6 | 3.0 | 5.1 | 10000.0 | 56.82 | 158.69 | 36.53 | SS |
| 6000. | 35.64 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 258.93 | 65.80 | NO |
| 6500. | 35.34 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 278.02 | 68.15 | NO |
| 7000. | 34.88 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 296.95 | 70.42 | NO |
| 7500. | 34.30 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 315.73 | 72.62 | NO |
| 8000. | 33.64 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 334.36 | 74.76 | NO |
| 8500. | 32.92 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 352.87 | 76.84 | NO |
| 9000. | 32.17 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 371.25 | 78.87 | NO |
| 9500. | 31.40 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 389.51 | 80.84 | NO |
| 10000. | 30.63 | 5 | 1.0 | 1.4 | 10000.0 | 111.88 | 407.66 | 82.77 | NO |
| 15000. | 26.20 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 388.89 | 58.09 | NO |
| 20000. | 22.79 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 501.31 | 63.23 | NO |
| 25000. | 20.05 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 610.05 | 67.59 | NO |
| 30000. | 17.84 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 715.84 | 71.42 | NO |
| 40000. | 14.47 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 920.42 | 76.89 | NO |
| 50000. | 12.18 | 6 | 1.0 | 1.7 | 10000.0 | 92.88 | 1117.59 | 81.45 | NO |

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

| | | | | | | | | | |
|------|-------|---|------|------|--------|-------|-------|-------|----|
| 193. | 248.9 | 4 | 10.0 | 11.6 | 3200.0 | 28.47 | 15.13 | 15.55 | SS |
|------|-------|---|------|------|--------|-------|-------|-------|----|

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, $X < 3 \cdot LB$

*** REGULATORY (Default) ***

PERFORMING CAVITY CALCULATIONS
 WITH ORIGINAL SCREEN CAVITY MODEL
 (BRODE, 1988)

*** CAVITY CALCULATION - 1 ***

| | | |
|--------------------|---|-------|
| CONC (UG/M**3) | = | 1589. |
| CRIT WS @10M (M/S) | = | 10.31 |
| CRIT WS @ HS (M/S) | = | 12.51 |
| DILUTION WS (M/S) | = | 6.25 |
| CAVITY HT (M) | = | 31.34 |
| CAVITY LENGTH (M) | = | 60.78 |

*** CAVITY CALCULATION - 2 ***

| | | |
|--------------------|---|-------|
| CONC (UG/M**3) | = | 0.000 |
| CRIT WS @10M (M/S) | = | 99.99 |
| CRIT WS @ HS (M/S) | = | 99.99 |
| DILUTION WS (M/S) | = | 99.99 |
| CAVITY HT (M) | = | 21.30 |
| CAVITY LENGTH (M) | = | 20.37 |

ALONGWIND DIM (M) = 13.72

ALONGWIND DIM (M) = 39.62

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

END OF CAVITY CALCULATIONS

*** INVERSION BREAK-UP FUMIGATION CALC. ***

CONC (UG/M**3) = 2.139

DIST TO MAX (M) = 4641.00

*** SUMMARY OF SCREEN MODEL RESULTS ***

| CALCULATION PROCEDURE | MAX CONC (UG/M**3) | DIST TO MAX (M) | TERRAIN HT (M) |
|--------------------------|-----------------------|--------------------|---------------------------|
| SIMPLE TERRAIN | 6.913 | 193. | 0. |
| BLDG. CAVITY-1 | 44.14 | 61. | -- (DIST = CAVITY LENGTH) |
| BLDG. CAVITY-2 | 0.000 | 20. | -- (DIST = CAVITY LENGTH) |
| INV BREAKUP FUMI | 2.139 | 4641. | -- |

October 23, 2001

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**RESPONSES TO COMMENTS AND QUESTIONS
SUBMITTED DURING A PUBLIC COMMENT PERIOD
FOR THE PROPOSED TIER II OPERATING PERMIT MODIFICATION
FOR LOUISIANA-PACIFIC CORPORATION, SANDPOINT, IDAHO**

Introduction

The public comment period for the proposed Tier II Operating Permit Modification for Louisiana-Pacific Corporation (LP), Sandpoint, Idaho was held from July 20 through August 20, 2001. Comment packages, which included the application materials, the Idaho Department of Environmental Quality (Department) technical analysis, and the proposed permit, were made available for public review at the Coeur d'Alene Public Library, the DEQ Regional Office in Coeur d'Alene, and state office in Boise. Comments and questions were received by the Department in the form of written comments submitted by mail, facsimile, and email.

Public comments regarding the air analysis and quality aspects of the proposed permit and analysis have been summarized below. Due to the similarity of many of the comments received, the summary contains some comments that have been combined and/or paraphrased in order to eliminate duplication and to provide a more concise summary. Questions, comments, and/or suggestions received during the comment period which did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed.

Public Comments and DEQ Responses

Comment 1: I live in Sandpoint just a few blocks from the LP mill and have been very concerned about air and noise pollution from the mill before this request even surfaced. I have called the DEQ and the City of Sandpoint concerning my concerns more than once. It is very wrong that an operation such as a mill exists at all in a residential area. I close my windows and wear earplugs and still can hear horrible noise on some nights. I was told that this noise was the "scrubbers" cleaning at the mill. My house is always dusty. My white windowsills in my bedroom (which faces North toward the mill) are grimy with large gritty particles which blow through my screen. Of course I am against any increase in short-term emission limits for nitrogen oxides, sulfur dioxide and carbon monoxide at its planing mill on Boyer Avenue. My preference would be for the mill to leave our town, for the sake of our lungs, our children's health and our right to quiet nights!

Response to 1: The Department of Environmental Quality is charged by Idaho State Statute to operate a program to issue air pollution permits. The purpose of this program is to safeguard Idaho's air quality and to limit and control emissions of air contaminants from sources. The Department carefully evaluates facility plans for construction of air pollution sources to ensure that these sources are capable of meeting state and federal air quality standards.

It is critical that the limitations of the Department's permitting authority be understood. The Department does not act as a statewide planning and zoning board to decide where facilities are located, nor should it. Local governments should decide where potential air pollution emitting facilities are to be located, and they should also decide what types of industrial facilities are to be allowed in their community, not a state agency in Boise.

The Department requires companies, such as LP-Sandpoint, to submit plans and specifications detailing the type of facility to be constructed and the amount of expected emissions. Often, the initial permit application is declared incomplete because of the submission of insufficient information.

Once all the necessary information has been received, the application is declared complete, and the Department reviews the data to make sure the following criteria are met:

- No violations of the outside, or ambient, air quality standards will occur during normal operation of the plant.
- The industrial process will emit pollutants below the limits specified in state and federal air quality rules.
- The facility will be able to demonstrate continuous compliance with state and federal air quality rules.

The Department assumes all facilities will be built in populated areas, and issues or denies permits based on the same criteria statewide. The Department does not determine where industries operate, but does determine compliance with state and federal air quality regulations.

The proposed emission limit increases in this permit are based on a conservative analysis using referenced emission factors for nitrogen oxides, sulfur dioxide, and carbon monoxide which are below the National Ambient Air quality Standards (NAAQS).

The proposed permit requires particulate emissions controls. LP-Sandpoint requested no change in particulate emissions. The Hog Fuel Boiler controls particulate emissions using an Electrified Filter Bed (EFB) media baghouse. The transfer cyclone, truck bin baghouse, and related pneumatic equipment are used as a means of process control for particulate emissions. Fugitive emissions sources shall be reasonably controlled by watering and sweeping truck operations in accordance with IDAPA 58.01.01.650-651.

The Department recommends any dust (particulate) problems caused by the LP-Sandpoint mill be addressed to Mr. Tom Harmon of the Coeur d'Alene Regional Office. Identification of specific dust sources which appear to be causing a problem should be addressed to the Regional Office to expedite resolution of the situation.

Noise issues pertaining to the LP-Sandpoint planing mill should be resolved by local authority.

Comment 2:

A number of general and administrative comments were received from LP-Sandpoint on the proposed permit for review and consideration. LP-Sandpoint requested the following changes:

Response to 2: The Department has reviewed the facility comments and has revised the proposed permit to incorporate many of LP-Sandpoint's general and administrative changes. The facility information has been amended to include appropriate facility contacts and phone numbers. One global change addressed emissions limits, which are now listed in the Appendix. Other global changes were made in the permit to reference IDAPA 58.01.01, wood by-product, Hog Fuel Boiler, and paved road emissions. Specific permit requests are addressed below:

Comment 3: **Page 4 of 14**

2.1 Maximum Operation Limit (now section 2.7) Current steam production is limited to 65,000 pounds of steam per hour based on a three-hour average as established by past performance testing. (Includes paragraph 4 of General Provision I).

Response to 3: **2.1 Maximum Operation Limit (now section 2.7)** Current steam production is limited to 65,000 pounds of steam per hour based on a three-hour average as established by past performance testing. The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test in accordance with General Provision I of this permit.

Comment 4: **2.3 (now section 2.8)** Scheduled and routine maintenance to the EFB shall be performed. Procedures and notification of excess emissions will be provided to Department representatives per IDAPA 58.01.01.130 through 136.

Response to 4: **2.3 (now section 2.8)** Scheduled and routine maintenance to the EFB shall be performed. Procedures and notification of excess emissions shall be provided to Department representatives per IDAPA 58.01.01.130 through 136.

Comment 5: **2.4 (now section 2.8)** Scheduled and routine maintenance to the EFB media baghouse shall be performed. Procedures and notification of excess emissions will be given to DEQ per IDAPA 58.01.01.130 through 136.

Response to 5: **2.4 (now section 2.8)** scheduled and routine maintenance to the EFB media baghouse shall be performed. Procedures and notification of excess emissions shall be provided to Department representatives per IDAPA 58.01.01.130 through 136.

Comment 6: **2.5 (now section 2.9)** The permittee shall develop an annual operating maintenance schedule for the EFB to minimize unnecessary shutdowns...

Response to 6: 2.5 stet

Comment 7: **Page 5 of 14**

3.2.1 (now section 2.13) The term "hourly steam production rate" shall mean the amount of steam produced by the boiler in pounds of steam per hour, averaged over the hour.

Response to 7: **3.2.1 (now section 2.13)** The permittee is required to monitor the Hog Fuel Boiler steam production rate on an hourly basis and determine rolling three-hour average steam production rates to demonstrate compliance with Section 2.7 of the permit.

Comment 8: **Page 6 of 14**

4.2 (now section 2.20) Routine and scheduled maintenance reports shall be prepared stating any corrective actions taken. Excess emissions shall be reported per IDAPA 58.01.01.130 through 136. Maintenance and excess emissions records will be maintained onsite for the most recent 2-year period. Access to these records shall be granted to Department representatives upon request.

Response to 8: 4.2 (now section 2.20) Routine and scheduled maintenance reports shall be prepared stating any corrective actions taken. Excess emissions shall be reported per IDAPA 58.01.01.130 through 136. Maintenance and excess emissions records shall be maintained on site for the most recent two-year period. Access to these records shall be made available to Department representatives upon request.

Comment 9: **Page 8 of 14**

2.1.2 and 2.1.3 (now section 4.4) Please delete these two paragraphs. LP believes operating requirements for the truck bin baghouse is adequately described by paragraph 2.1.1.

Response to 9: The Department has incorporated 2.1.2 and 2.1.3 into 2.1.1 (now section 4.5) Baghouse Specifications. The baghouse shall be installed, operated, and maintained in accordance with the manufacturer's recommendations. All manufacturer's specifications including baghouse pressure drop, operating, and installation instructions shall be kept onsite as long as the baghouse is used and shall be made available to Department representatives upon request.

2.1.1.1 (now section 4.6) Scheduled and routine maintenance shall be performed to the truck bin baghouse. Procedures and notification of excess emissions shall be provided to Department representatives per IDAPA 58.01.01.130 through 136.

3.1 (now section 4.7) The truck bin baghouse shall be monitored periodically. Routine and scheduled maintenance reports shall be prepared stating any corrective actions taken. Excess emissions shall be reported per IDAPA 58.01.01.130 through 136. Maintenance and excess emissions records shall be maintained onsite for the most recent two-year period. Access to these records shall be made available to Department representatives upon request.

Comment 10: **Page 9 of 14**

2.1 through 2.2.2 (now section 5.4) Kiln throughput should be listed as 214 million board feet per year and finished product throughput listed at 200 million board feet per year.

Response to 10: 2.1 (now section 5.3) Truck Bin Loadout Maximum Throughput
The maximum throughput of planer shavings, sawdust, and hogged trim ends shall not exceed 37,150 tons per year (Appendix B). Compliance with this limit shall be determined by establishing throughput on an annual rolling average.

2.2.1 (now section 5.4) The maximum throughput of lumber produced by the dry kilns shall not exceed 214 million board feet per year. The quantity of finished lumber produced shall not exceed 200 million board feet per year.

Comment 11: **Page 9 of 14**

3.2 (now section 5.5) Change reference to "tons per month" to "thousand board feet per month" (LP feels that this a more accurate representation of production at the facility. At best "tons per month is an estimate.)

Response to 11: The Department agrees with unit measurement for dry kiln throughput of finished lumber produced in thousand board feet per month.

3.2 (now section 5.5) Dry Kiln Throughput

Dry kiln throughput shall be monitored on the basis of finished product. The permittee shall record the quantities of finished lumber produced (thousand board feet per month). These records shall be maintained onsite for the most recent two year period.

Comment 12: **Page 10 of 14**

(now section 6.5) If PM₁₀ emissions from fugitive emission sources exceed 20% over three minutes in a rolling hour, the permittee shall initiate and complete appropriate and reasonable actions to correct the condition.

Response to 12: PM₁₀ emissions limits refer to a pound per hour and ton per year limit listed in the appendix (Vehicle Traffic - Paved Areas). The permittee is required to maintain standard operating procedures for the control of fugitive emissions according to Section 6.15 of the permit.

Comment 13: **2.1 Control Methods**

At all times, fugitive emissions shall be reasonably controlled as required in IDAPA 58.01.01.650 and 651.

Response to 13: Section 6.12 sites the fugitive emissions rule and was added to the permit.

Comment 14: **Page 10**

2.1 and 2.1.2 Please delete these paragraphs in their entirety, and other statements regarding ESCDSs, as LP believes these control measures are adequately referenced by citing IDAPA 58.01.01.650-651, as above in section 2.1. In their stead, please insert the following:
2.2.1 The facility shall operate a sweeper/water truck for control of fugitive emissions as required above.

Response to 14: The Department concurs with the IDAPA control measure reference for fugitive emissions.

2.2.1 (now section 6.11) The facility shall operate a sweeper/water truck for control of paved road emissions as required in 2.1 of this permit section.

Comment 15: **3.1 through 3.3.6 Please delete these paragraphs in their entirety, and other statements regarding ESCDSs, as LP believes these control measures are adequately referenced by citing IDAPA 58.01.01.650-651, as above in section 2.1. In their stead, please insert the following:**

3.1 Fugitive Dust Control Procedures

3.1.1 (now section 6.9) The sweeper/water truck operator shall maintain a log book and record the date and times of operation.

3.1.2 (now section 6.10) The facility will develop and maintain Standard Operating Procedures (SOPs) and utilize Best Management Practices (BMPs) for control of fugitive dust.

Response to 15: **3.1.1 (now section 6.15) The sweeper/water truck operator shall maintain a log and record the date and times of operation.**

3.1.2 (now section 6.16) The facility will develop and maintain Standard Operating Procedures (SOPs) and utilize Best Management Practices (BMPs) for control of fugitive emissions.

Comment 16: **Page 11 of 14**

4.1 (now section 6.14) The sweeper/water truck operator's log book records will be maintained for the most recent two year period and made available to Department representatives upon request.

4.2 (now section 6.15) A copy of the Fugitive Dust Control SOPs will be made available to Department representatives upon request.

Response to 16: **4.1 (now section 6.15) The sweeper/water truck operator's log records shall be maintained onsite for the most recent two year period and made available to Department representatives upon request.**

4.2 (now section 6.15) A copy of the Fugitive Dust Control SOPs shall be made available to Department representatives upon request.

Comment 17: **Page 13 of 14**

A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall be governed by the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01, and the Environmental Protection and Health Act, Idaho Code 39-101, et seq.

Response to 17: **The General Provision statements may not be amended specifically to this permit. General Provisions were created by the Department to include standard permit language to apply equally to every Tier II permitted facility.**

A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101, et seq.

Comment 18: **A number of general comments were directed towards the technical memorandum by LP-Sandpoint to review and revise process descriptions of the facility and to omit various sections that no longer accurately represent the facility planing mill.**

Response to 18: **The technical memorandum is not an enforceable document but serves to support the information and requirements in the permit. The Department reviewed, revised, and omitted process descriptions and other irrelevant passages in the technical memorandum which do not accurately represent the facility planing mill.**